

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

NBA PROPERTIES, INC.,

Plaintiff,

v.

DONGGUAN ALLEN HOUSE OF JEWELRY  
& FINDINGS CO., LTD., et al.,

Defendants.

Case No. 22-cv-07107

**Judge Joan B. Gottschall**

**Magistrate Judge Sheila M. Finnegan**

**PLAINTIFF’S AGREED MOTION FOR ENTRY OF A CONSENT JUDGMENT  
AS TO CERTAIN DEFENDANTS**

Plaintiff NBA Properties, Inc. (“NBAP” or “Plaintiff”) filed an Amended Complaint [34] against, among others, Defendant Nos. 4, 47, 112, 121, 126, 139, 140, 151, 155, 160, 163, 180, 189, 194, 196, 199, 201, 203, 204, 214, 222, 230, 233, 238, and 275 (“Defendants”) (collectively, the “Parties”) on January 9, 2023. Plaintiff and Defendants have resolved all claims arising from the allegations in the Amended Complaint, and have agreed to entry of the proposed Consent Judgment. As such, the Parties move this Honorable Court for the entry of a Consent Judgment as to Defendant Nos. 4, 47, 112, 121, 126, 139, 140, 151, 155, 160, 163, 180, 189, 194, 196, 199, 201, 203, 204, 214, 222, 230, 233, 238, and 275.

A memorandum accompanies this motion. A copy of the proposed Consent Judgment has been submitted to Proposed\_Order\_Gottschall@ilnd.uscourts.gov.

Dated this 21st day of April 2023.

Respectfully submitted,

/s/ Allyson M. Martin

Amy C. Ziegler

Justin R. Gaudio

Allyson M. Martin

Kahlia R. Halpern

Greer, Burns & Crain, Ltd.

300 South Wacker Drive, Suite 2500

Chicago, Illinois 60606

312.360.0080

312.360.9315 (facsimile)

aziegler@gbc.law

jgaudio@gbc.law

amartin@gbc.law

khalpern@gbc.law

*Attorneys for Plaintiff NBA Properties, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21st day of April 2023, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, I will electronically publish the documents on a website to which the Domain Names that have been transferred to Plaintiff's control now redirect, and I will send an e-mail to the e-mail addresses identified in Exhibit A hereto that includes a link to said website.

/s/ Allyson M. Martin  
Amy C. Ziegler  
Justin R. Gaudio  
Allyson M. Martin  
Kahlia R. Halpern  
Greer, Burns & Crain, Ltd.  
300 South Wacker Drive, Suite 2500  
Chicago, Illinois 60606  
312.360.0080  
312.360.9315 (facsimile)  
aziegler@gbc.law  
jgaudio@gbc.law  
amartin@gbc.law  
khalpern@gbc.law

*Attorneys for Plaintiff NBA Properties, Inc.*